

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	DECLARATION
-v.-	:	<u>OF PUBLICATION</u>
	:	
SABITRI LAFOREST,	:	21 Cr. 272 (CM)
	:	
Defendant.	:	
	:	
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Matthew R. Shahabian, pursuant to Title 28, United State Code, Section 1746,  
declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Damian Williams,  
United States Attorney for the Southern District of New York, and attorney for the Government  
herein, and

2. Attached to this declaration are (A) a true and correct copy of a notice of  
criminal forfeiture in this action, and (B) a true and correct copy of an Advertisement Certification  
Report, indicating that the aforementioned notice was posted on an official government internet  
site (www.forfeiture.gov) for at least 30 consecutive days, beginning on October 10, 2023 through  
November 8, 2023 as required by Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty or  
Maritime Claims and Asset Forfeiture Actions, and

Both documents were obtained from a Consolidated Asset Tracking System  
maintained by the Department of Justice.

Dated: New York, New York  
August 29, 2024

/s/ Matthew R. Shahabian  
Matthew R. Shahabian  
Assistant United States Attorney

Attachment 1

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
COURT CASE NUMBER: 21 CR. 272 (CM); NOTICE OF FORFEITURE**

Notice is hereby given that on June 16, 2023, in the case of U.S. v. Sabitri LaForest, Court Case Number 21 CR. 272 (CM), the United States District Court for the Southern District of New York entered an Order condemning and forfeiting the following property to the United States of America:

All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 6805 NW 70th Place, Pompano Beach, FL 33067, owned by GARRY LAFOREST and SABITRI LAFORESTT (21-USS-000334);

One 2019 Chevrolet Corvette ZR-1 bearing VIN 1G1Y42D9XK5801366; (21-USS-000335);

One 2020 Ford Shelby GT500 bearing VIN 1FA6P8SJ6L5501627; (21-USS-000336);

\$914,640.64 in United States currency, formerly on deposit in TD Bank, N.A. account number 4339985496 in the name of the Prive Hospitality Group LLC (21-USS-000337);

\$8,997.16 in United States currency, formerly on deposit in JP Morgan Chase Bank, N.A. account number 226099163 in the name of Laforest Consulting Inc.; (21-USS-000338);

\$120,200.20 in United States currency, formerly on deposit in Robinhood Securities LLC account number 423563741 held in the name of Sanjay Laforest, as the clearing broker for Robinhood Financial LLC or At Cash Management ACH account number 40902423563741 managed by Robinhood Securities and Robinhood Financial (21-USS-000339);

\$81.29 in United States currency, formerly on deposit in Bank of America, N.A. account number 483069015129 in the name of Tatiana Laforest (21-USS-000340);

\$10.99 in United States currency, formerly on deposit in Bank of America, N.A. account number 483069015161 in the name of Tatiana Laforest (21-USS-000341);

\$740.19 in United States currency, formerly on deposit in TD Bank, N.A. account number 4338908548 in the name of Tatiana Laforest (21-USS-000342);

\$6,487.32 in United States currency, formerly on deposit in Robinhood Securities LLC account number 687147108 held in the name of Tatiana Laforest, as the clearing broker for Robinhood Financial LLC (21-USS-000343);

Items seized on or about May 12, 2021 pursuant to a judicially authorized search of a residence at 101st Avenue, Queens Village, New York, which included the following property: (21-USS-000570)

- a. One Tag Heuer 2000 WN1153 Professional Watch Men's 18K Rose Gold Silver 2-Tone;
- b. One Cartier Roadster Chronograph Automatic OR 750/ACIER 18K Gold & Steel Men's 2618;
- c. One Omega Constellation Chronometer Men's Watch Automatic Steel/Gold;
- d. One Rolex Oyster Perpetual Lady Datejust Gold Stainless Steel with Diamond Bezel;
- e. One Omega Constellation Ladies 18K Yellow Gold Stainless Steel Diamond Bezel Watch;
- f. One Lucien Picard Silver, square, men's watch;
- g. One Bulova Marine Star 100m, w/ broken silver bracelet;
- h. One Bulova Marine Star 100m, w/ leather strap;
- i. One Bulova Women's silver watch with gold looking arms silver bracelet;
- j. One Bulova Marine Star 100m, w/ silver and gold bracelet and blue and gold bezel;
- k. One Invicta Men's Watch 22448 Bolt Zeus Black Dial Chronograph Dial Gold Tone Steel;
- l. Citizen Eco-Drive men's watch 200m with silver bracelet; and
- m. Citizen Eco-drive women's watch with gold like bezel and arms;

Item seized on or about May 12, 2021, the Government conducted a judicially authorized search of the Defendant's residence in Parkland, Florida, and seized the following property: (21-USS-000571)

- a. One Stainless Steel Cartier Roadster large silver Dial Men's Watch; Model number: W62025V3; Serial number: 2510 230669CE; and

\$4,354.95 in United States currency, formerly on deposit in TD Bank, N.A. account number 4277377466 in the name of the Prive Group LLC (21-USS-000573)

The United States hereby gives notice of its intent to dispose of the forfeited property in such manner as the United States Attorney General may direct. Any person,

other than the defendant(s) in this case, claiming interest in the forfeited property must file an ancillary petition within 60 days of the first date of publication (October 10, 2023) of this Notice on this official government internet web site, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(n)(1). The ancillary petition must be filed with the Clerk of the Court, United States District Court, 500 Pearl Street, Room 120, New York, NY 10007, and a copy served upon Assistant United States Attorney Sebastian Swett, One St. Andrew's Plaza, New York, NY 10007. The ancillary petition shall be signed by the petitioner under penalty of perjury and shall set forth the nature and extent of the petitioner's right, title or interest in the forfeited property, the time and circumstances of the petitioner's acquisition of the right, title and interest in the forfeited property and any additional facts supporting the petitioner's claim and the relief sought, pursuant to 21 U.S.C. § 853(n).

Following the Court's disposition of all ancillary petitions filed, or if no such petitions are filed, following the expiration of the period specified above for the filing of such ancillary petitions, the United States shall have clear title to the property and may warrant good title to any subsequent purchaser or transferee.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. See 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition for remission need not be made in any particular form and may be filed online or in writing. You should file a petition for remission not later than 11:59 PM EST 30 days after the date of final publication of this notice. See 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition for remission form that may be mailed and the link to file a petition for remission online. If you cannot find the desired assets online, you must file your petition for remission in writing by sending it to Assistant United States Attorney Sebastian Swett, One St. Andrew's Plaza, New York, NY 10007. This website provides answers to frequently asked questions (FAQs) about filing a petition for remission. You may file both an ancillary petition with the court and a petition for remission or mitigation.



## Advertisement Certification Report

The Notice of Publication was available on the [www.forfeiture.gov](http://www.forfeiture.gov) web site for at least 18 hours per day between October 10, 2023 and November 08, 2023. Below is a summary report that identifies the uptime for each day within the publication period and reports the results of the web monitoring system's daily check that verifies that the advertisement was available each day.

U.S. v. Sabitri LaForest

**Court Case No:** 21 CR. 272 (CM)  
**For Asset ID(s):** See Attached Advertisement Copy

Consecutive Calendar Day Count	Date Advertisement Appeared on the Web Site	Total Hours Web Site was Available during Calendar Day	Verification that Advertisement existed on Web Site
1	10/10/2023	23.9	Verified
2	10/11/2023	23.9	Verified
3	10/12/2023	23.9	Verified
4	10/13/2023	23.9	Verified
5	10/14/2023	23.9	Verified
6	10/15/2023	23.9	Verified
7	10/16/2023	23.9	Verified
8	10/17/2023	23.9	Verified
9	10/18/2023	23.9	Verified
10	10/19/2023	23.9	Verified
11	10/20/2023	23.9	Verified
12	10/21/2023	23.9	Verified
13	10/22/2023	23.9	Verified
14	10/23/2023	23.9	Verified
15	10/24/2023	23.9	Verified
16	10/25/2023	23.9	Verified
17	10/26/2023	24.0	Verified
18	10/27/2023	24.0	Verified
19	10/28/2023	23.9	Verified
20	10/29/2023	23.9	Verified
21	10/30/2023	23.9	Verified
22	10/31/2023	24.0	Verified
23	11/01/2023	23.9	Verified
24	11/02/2023	23.9	Verified
25	11/03/2023	23.9	Verified
26	11/04/2023	23.9	Verified
27	11/05/2023	24.0	Verified
28	11/06/2023	23.8	Verified
29	11/07/2023	23.9	Verified
30	11/08/2023	23.9	Verified

Additional log information is available and kept in the archives for 15 years after the asset has been disposed.